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Attorney for GERALDINE SHELBY SNYDER

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GERALDINE SHELBY SNYDER,

Defendant.

Case No. 2:99-cr-287-PMP-RJJ

**MOTION FOR EARLY TERMINATION
OF SUPERVISED RELEASE**

(Hearing Requested)

COMES NOW the defendant, GERALDINE SHELBY SNYDER, by and through her counsel of record, Nisha Brooks-Whittington, Assistant Federal Public Defender, and pursuant to 18 U.S.C. § 3583(e)(1) and Fed. R. Crim. P. 32.1, hereby moves this Honorable Court for early termination of her five-year term of supervised release. This request is based on the Points and Authorities attached hereto.

DATED this 7th day of April, 2011.

FRANNY A. FORSMAN
Federal Public Defender

By /s/Nisha Brooks-Whittington
NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 The statute governing early termination of supervised release, 18 U.S.C. § 3583(e)(1),
3 provides that the court may terminate a term of supervised release “and discharge the defendant
4 released at any time after the expiration of one year of supervised release, . . . if it is satisfied that
5 such action is warranted by the conduct of the defendant released and in the interest of justice.”

6 On April 14, 2000, Geraldine Shelby Snyder (“Ms. Snyder”), pled guilty to
7 Conspiracy to Distribute a Controlled Substance, in violation of 21 U.S.C. § 846. Ms. Snyder was
8 sentenced to one hundred and twenty months (or ten years) in the custody of the Bureau of Prisons
9 and to a five-year term of supervised release. While incarcerated, Ms. Snyder successfully
10 completed the Residential Drug Abuse Program (“RDAP”). She also successfully completed the
11 Community Transition Drug Abuse Treatment program during her stay at the residential re-entry
12 center in Las Vegas.

13 In December 2007, Ms. Snyder commenced her term of supervised release in the
14 District of Nevada. While on supervision, Ms. Snyder participated and successfully completed group
15 and one-on-one counseling at Bridge Counseling Associates. She timely files her monthly reports
16 and has never tested positive for any illegal substance. Ms. Snyder has never received any
17 infractions or modifications while on supervision. She maintains a stable home life and is supported
18 by her family. Indeed, Ms. Snyder has proven to be a positive role-model to her son and brothers
19 in how she has turned her life around for the better.

20 Ms. Snyder maintains stable employment. She is a full-time housekeeper at the Best
21 Western Hotel & Casino in Las Vegas, NV and has been in this position since her transfer to the
22 residential re-entry center in 2007. Undersigned counsel spoke with Ms. Snyder’s supervisor and
23 was informed that Ms. Snyder is a “wonderful and beautiful person,” a “hard-worker,” and “always
24 arrive on time to work.” Ms. Snyder has worked hard to not return to the lifestyle that led her before
25 this court and has been successful in her efforts.

26 Ms. Snyder has completed over three years on supervised release in full compliance
27 with her terms of supervised release. She has proven herself to be a model probationer. Because
28 of Ms. Snyder’s success on supervised release her case has been moved over to the lower priority

caseloads. Ms. Snyder's conduct while on supervised release is strong evidence that she is ready for her supervision period to end. Ms. Snyder has a stable and supportive home life and is excelling at work.

Ms. Snyder poses a minimal risk of recidivism. Under these circumstances, further supervision is not necessary to protect the public. Ms. Snyder is not in need of any services from probation in order to continue leading a productive, law abiding-life. Ms. Snyder is an appropriate candidate for early termination of supervised release. Ms. Snyder has complied with every condition of her terms of supervised release and has been accountable to her probation officer, Amberleigh Valdez, at all times.

Undersigned counsel spoke with Ms. Valdez and she is not agreeable to Ms. Snyder's request for early termination based upon the nature of the underlying offense. Nonetheless, Ms. Valdez explained that Ms. Snyder has been compliant while on supervision and has completed everything that has been required of her to perform.

CONCLUSION

In summary, Ms. Snyder has made the most of her over three years of supervision. Ms. Snyder has learned from her past transgression and no longer desires the social settings that led her before this court. For all of these reasons, Ms. Snyder respectfully requests that this court grant her early termination from supervised release.

Respectfully submitted by,

By /s/ Nisha Brooks-Whittington
NISHA BROOKS-WHITTINGTON,
Assistant Federal Public Defender

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,

Plaintiff,

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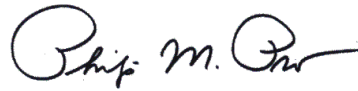
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PROPOSED ORDER

Based on the above points and authorities and good cause appearing therefore, the
MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE is hereby granted.

IT IS HEREBY ORDERED that the term of supervised release be terminated.

DATED this __ 25th day of April, 2011.



UNITED STATES DISTRICT JUDGE

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that I am an employee of the Law offices of the Federal Public Defender for the District of Nevada and am a person of such age and discretion as to be competent to serve papers.

That on April 7, 2011, I served an electronic copy of the above and foregoing **MOTION FOR EARLY TERMINATION OF SUPERVISED RELEASE** by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN
United States Attorney
333 Las Vegas Blvd So, Suite 5000
Las Vegas , NV 89101

/S/ Nancy Vasquez
Nancy Vasquez, Legal Secretary to
NISHA BROOKS-WHITTINGTON
Assistant Federal Public Defender